Fort Nelson Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
Fort Nelson Forest District
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This is a summary of the public input received on the Timber Supply Review in the Fort Nelson Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Fort Nelson Timber Supply Area

Background

As part of the review of timber supply in the Fort Nelson Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Fort Nelson TSA *Data Package* and *Information Report* in July 1997. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Fort Nelson TSA. A 30-day review period, ending August 25, 1997, was provided for the public to comment on these documents.

On March 16, 2000, the British Columbia Forest Service released the *2000 Fort Nelson TSA Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended May 15, 2000.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Fort Nelson TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the Freedom of Information and Protection of Privacy Act) can be reviewed at the Fort Nelson Forest District office.

Public Review Process and Response

Fort Nelson District staff actively solicited public input on the Timber Supply Review in the Fort Nelson TSA through the following actions:

- copies of the Information Report were mailed to 32 stakeholders, interest groups and individuals in the Fort Nelson TSA or adjacent timber supply areas. Copies were also mailed to the Kaska Dene Council, Dene Keepers of the Earth, Treaty 8 Tribal Association, and Fort Nelson, Dene Tha, Fort Liard, Lower Post and Prophet River First Nations.
- copies of the *Data Package* were mailed to the forest licensee (Slocan Forest Products) and to the Fort Nelson, Dene Tha, Fort Liard, Kaska Dene and Prophet River First Nations.
- copies of the *Fort Nelson TSA Analysis Report* and *Public Discussion Paper* were mailed or provided to Slocan Forest Products, Fort Nelson Town Council, the Northern Rockies Regional District, and the Fort Nelson, Dene Tha, Fort Liard, Kaska Dene and Prophet River First Nations.
- the *Data Package* and the *Fort Nelson TSA Analysis Report* were also available at the forest district office in Fort Nelson and about six copies of each were picked up.
- meetings regarding both the *Data Package* and *Analysis Report* were held with representatives from local government and the Land and Resource Management Plan (LRMP) Working Group.
- district staff responded to a number of phone calls and held informal meetings with interested individuals and the forest industry to explain the information in the reports and to answer specific questions.

- an offer to present or discuss the *Data Package* and the *Analysis Report* was made to all First Nations with interests in the Fort Nelson TSA.
- the local newspaper was provided with news releases and published stories on the Timber Supply Review in the Fort Nelson TSA.

The Fort Nelson Forest District received nine written submissions on the *Data Package* and seven submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Fort Nelson TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Land Base Factors

Slocan Forest Products Ltd. (SFP) raises a number of concerns about the definition of the operable land base, noting that economic viability fluctuates with markets and access development, and is determined as much by the log profile as by species, volume per hectare or distance to the mill. SFP also says that areas considered uneconomic today may not be so tomorrow and should not be removed from the timber harvesting land base (THLB). The company requests full industry consultation on the determination of the criteria used to define the operable land base.

The Fort Nelson-Liard Regional District (now the Northern Rockies Regional District) questions whether the forest industry is involved in the determination of economic operability. The Regional District also expresses support for the initiative to harvest birch, while the Ministry of Environment, Lands and Parks (MELP) questions the legitimacy of including birch in the THLB when there is not yet any commercial utilization of this species.

With regard to mixedwood stands, SFP says that due to uncertainty in the inventory data (e.g., misidentification of coniferous types), it's essential that more optimistic options be selected when determining the criteria for including or excluding mixedwood stands in the harvesting land base. MELP notes uncertainty about what percentage of the spruce types are black spruce, and says if it is 5% or more, this issue must be considered in this timber supply review.

SFP questions the criteria used to define low productivity sites, saying the minimum site indices, heights and volumes per hectare are too high. The company provides comparisons with other forest districts where these minimum criteria are higher and cruise information that shows how much area that falls below the minimum guidelines has been harvested by SFP.

The Regional District questions whether, given the current provincial guidelines, future resource road construction will be discouraged and how that might affect resources that may be deemed uneconomical or inaccessible due to lack of infrastructure. SFP says that Fort Nelson district policy requires reforestation of all temporary roads and landings when harvesting is complete, and therefore these areas should not be removed from the THLB.

The Regional District requests further information on the process used to determine the effects of future seismic activity on the harvesting land base and harvest levels, and conversely how seismic activity will be facilitated within the THLB.

SFP expresses the opinion that it's unreasonable to exclude all seismic areas from the harvesting land base. The company says seismic areas within a harvesting area must be reforested and a review of older seismic lines indicates a large amount of naturally regenerated lines contributing to the THLB. SFP is also of the opinion that a large percentage of the 4334 hectares of forested area lost to oil and gas exploration since 1994 is on low sites and in unmerchantable forest types, and therefore a careful examination of types is needed before removing this area from the THLB. SFP notes its understanding that no further deductions will be made for future seismic exploration.

The Regional District expresses support for a sensitivity analysis on protected areas and requests the opportunity to provide input. The Regional District also questions how the potential reversion of the Canadian Chopstick Manufacturing Co. (CCMC) forest licence is reflected in the timber supply review.

Inventory Factors

SFP notes the need for a complete re-inventory of the Fort Nelson TSA and says now that it is policy to manage for the coniferous understory in mixedwood stands, it must be included in the inventory analysis. The Regional District says it is aware that the current timber supply may be underestimated due to the outdated inventory and questions whether the timber supply review will proceed if a new inventory is not completed before the timber supply analysis is done.

The Fort Nelson First Nation refers to a statement in the *Information Report* regarding the district's work on archaeological inventories and the development of management strategies, and requests clarification on how the Ministry of Forests has involved the First Nation.

Expected Rate of Growth and Productivity

SFP notes that the current growth models grow aspen with no succession to coniferous types, which does not reflect reality. The company says it is important to analyze the transition from aspen-spruce to spruce-aspen, and suggests using the Mixedwood Growth Model from Alberta to model growth in managed deciduous stands. SFP makes other recommendations on which timber supply models should be used to project the growth of established and future stands.

SFP questions the minimum harvestable age used for aspen (81 years) and says that 61 years is more appropriate as many aspen reach maximum growth then, or earlier. The company says if product requirements are used to drive minimum harvestable age, then a sensitivity analysis is needed to assess the implication of using the age at which maximum growth occurs.

Not Satisfactorily Restocked Areas

The Regional District says that about 9500 hectares are scheduled to be restocked over the next 10 years, and since the TSR covers five years, the District questions how this will be reflected in the analysis. SFP says that the 2500 hectares with regeneration problems should remain in the THLB, since these areas may be restocked using alternate methods. The company notes that Forest Renewal BC targets these types of areas for rehabilitation, and says it is reasonable to expect rehabilitation would occur in the next five to 10 years.

Silvicultural Systems

SFP notes that methods other than clearcutting are used in this TSA (e.g., clearcut with reserves and understory protection in deciduous-leading stands). The company says a precise definition of "original forests" is needed immediately and questions whether the requirement to use silvicultural tools to maintain original forests applies to coniferous and deciduous stands, or just to mixedwood stands.

Riparian and Visually Sensitive Areas

SFP requests further information on how the reductions for riparian values were achieved, and notes that operating regulations require a 10-metre reserve (not 30-metre as in the *Data Package*) on lakes larger than five hectares unless the district manager directs otherwise. To the company's knowledge, this has not occurred.

MELP asks for information about deductions for Riparian Management Zones, noting that in the first timber supply review in other TSAs, deductions varied based primarily on timber type. MELP notes recent discussions about management of active floodplains along large rivers and says they favour the application of guidelines in the *Riparian Management Area Guidebook* that require 70-100% retention of forests in these areas. MELP says many floodplains have been severely overharvested in the Fort Nelson TSA with high impacts on wildlife and fisheries.

SFP says a five-metre green-up for visual quality is not current practice and that visual quality objectives should not be part of the base case timber supply forecast, since none have been established.

Environmentally Sensitive Areas

SFP notes that all environmentally sensitive areas have been removed from the THLB, whereas in other TSAs only those with high value or sensitivity are removed entirely (i.e., ESA1 areas). The company says areas with moderate regeneration problems should not be removed from the harvesting land base, as SFP and others routinely harvest and reforest these sites. SFP requests a clarification of the criteria used to remove areas of moderate wildlife significance for caribou and goat habitat from the THLB.

Non-Recoverable Losses

SFP says that to properly estimate volumes lost to fire, netdown figures for inaccessibility, forest type, inoperability, and riparian and other reserves must be applied. Similarly, the company says volume lost to insects and disease must be modified to accurately depict operability.

Timber Supply Area Analysis Report

Land Base Factors

SFP says the analysis is overly conservative in assuming that areas of aspen with a site index of 17.7 metres or less should be removed from the THLB due to low productivity. The company says the assumption that after fires, these areas will not contribute to the harvestable land base is not supported by their observations. In their submission, the Northern Rockies Regional District and Town of Fort Nelson say they are unclear how much of the timber from low productivity sites could actually be utilized.

The MELP submission questions the inclusion of mixedwood stands in the THLB since the past harvest level has been very low and a management strategy for these types has not been finalized. MELP notes that these types have significant wildlife and biodiversity values, and recommends they either be removed from the THLB or considered for a partitioned cut, contingent on a management strategy that meets all resource objectives.

The Fort Nelson First Nation says that interest in harvesting birch does not take into account First Nations' traditional use. This submission also says the enlargement of the Fort Nelson TSA does not mitigate the forestry disturbance that is currently infringing on Treaty 8 rights and should not be used to justify an increase in harvesting.

Fort Nelson Timber Supply Area

The MELP submission requests clarification on how seismic exploration and development is factored into estimates of timber supply. For example, MELP asks if the volume harvested on seismic lines is part of the AAC and if seismic cuts are required to be reforested and, if so, do they then return to the THLB. With regard to future logging roads, MELP notes that 5% of the THLB will be harvested and then kept permanently in an early seral stage (i.e., bare ground). MELP says the removal of this land from the THLB means it no longer forms part of the calculations for biodiversity constraints, even though the area has been permanently removed as habitat.

SFP recommends establishment of a rehabilitation program to reforest some of the non-commercial brush areas currently removed from the THLB. The company believes this could produce an increase in the AAC.

Forest Inventory Factors

Four submissions comment on the need for a more accurate inventory in the Fort Nelson TSA, particularly with regard to the extent of mixedwood types and the need to distinguish black spruce from white spruce stands. SFP estimates, for example, that the base case forecast is overstated by 190 000 cubic metres per year as a result of inaccurate spruce typing.

The Regional District expresses concern about the reliability of projections in the timber supply analysis due to poor basic inventory information and is of the opinion that the new inventory work that is underway is not to the extent necessary. They question the possible negative effect of old inventory classifications, particularly with reference to aspen.

The MELP submission says spruce forests often include relatively large wetlands and other non-forested sites that were not recorded in the old inventory. MELP is of the opinion that riparian exclusions are insufficient to account for in-stand wetlands.

Expected Rate of Growth and Volume Estimates

The Regional District submission notes the difference between projected volumes in the timber supply analysis and SFP's reported actual average harvest. The Regional District says the large discrepancy raises doubt about the accuracy of volume projections.

SFP says that while analysis results indicate an average harvested volume of 300 cubic metres per hectare for deciduous forests, SFP's actual average harvest is 325 cubic metres per hectare. The company says this means the AAC could be increased by about 10%. Conversely, in SFP's opinion, the volumes estimated for unmanaged coniferous stands are very optimistic. The company compares the analysis result of 350 cubic metres per hectare with their average volume of 225 cubic metres per hectare. Using the latter figure would reduce the base case forecast by about 488 000 cubic metres per year, according to SFP.

SFP says the current outbreak of eastern spruce budworm is creating considerable decline in some spruce stands and this is not reflected in the base case analysis. The company suggests a monitoring process to understand the effects and severity of budworm attacks for the next timber supply review.

Biodiversity and Old Growth

SFP says on-the-ground identification of Old Growth Management Areas (OGMAs) and other such features in some landscape units will affect the THLB and result in an AAC reduction of 3-5%. MELP expresses the opinion that there appears to be enough timber in the Fort Nelson TSA to comply with full biodiversity requirements without any effect on harvest levels and suggests modeling this approach, rather than the standard 45/45/10 (low/medium/high biodiversity emphasis).

Fort Nelson Timber Supply Area

MELP notes that the timber supply model grows the timber in the non-contributing land base without allowing for any natural disturbance, and says this is an incorrect assumption given fire return intervals of 100 to 125 years in this TSA. As well, MELP says trends in global warming indicate the northern interior is warming at a rate three times the global average and this will increase the risk of fire events.

Wildlife

The Fort Nelson First Nation notes that if furbearers are at moderate risk due to roads, then the Treaty 8 right to trap must be also and this concern must be addressed. The First Nation disagrees with the statement in the *Analysis Report* that "virtually no open-roaded access presently exists in the TSA" since forestry and oil and gas companies use all-weather and fair-weather roads.

Riparian and Green-up Requirements

The Fort Nelson First Nation notes that areas along rivers more than 100 metres wide, which are important for hunting, trapping, gathering and other traditional use activities, are not required to have reserves. MELP says that since the early 1970s harvesting has been concentrated in forests along river corridors and floodplains, to the detriment of wildlife and biodiversity management. Now that river corridors are Special Management Areas within the LRMP and a different management regime in the future is expected, MELP says this may impact timber production, as may changes in the application of the federal *Fisheries Act* to floodplains.

MELP expresses concern that allowing 39% of the timber harvesting land base in a landscape unit below green-up may result in hydrological problems where the timber harvesting land base makes up a large portion of the total forest area.

Implications of Alternative Harvest Rates

MELP says that without a thorough environmental analysis, it's difficult for the chief forester to evaluate the short- and long-term environmental implications of the dramatic increase in timber supply and decrease in average harvested age proposed by the *Analysis Report*.

Socio-Economic Impacts

The submission from the IWA-Local 1-424 expresses concern with the recent downward trend in employment. The union says SFP at one time employed many more people under their current licence and expresses the opinion that SFP has not created jobs in their plywood plant but has only replaced jobs eliminated by downsizing their sawmill.

Omineca Enterprises says that contrary to the socio-economic analysis, they have a sawmill and a 11 500 cubic metre per year coniferous forest licence.

The Regional District submission states their opposition to any movement of timber outside the region, saying that wood harvested in the Fort Nelson TSA must be processed in the TSA so that economic benefits remain in the region. The District supports attracting a second company to the region, particularly one that creates a higher value product such as CCMC produced. The Fort Nelson Regional Economic Task Force agrees with the desirability of additional value-added manufacturing capacity in the TSA and suggests a study to research innovative transportation partnerships to offset high transportation costs.

Other Comments

Many submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Fort Nelson Timber Supply Area

Timber Supply Review Process

The Northern Rockies Regional District submission reminds the ministry of forests that a role of local government in economic development is to project, promote and prepare for "what ifs" in a five-year period and therefore the ministry should ensure that the timber supply review includes all vital information.

SFP suggests that the timber supply review should be based on species as opposed to land base. The company says this would simplify cut control and forest management. Both SFP and the Regional District question if other timber supply models should be used to more accurately reflect the growth and dynamics of mixedwood forests and raise confidence in timber supply projections.

Omineca Enterprises says their history and current status must be recognized and their rights dealt with before the timber supply review can fairly proceed. The company maintains they continue to have cutting rights under two old licences (TSHLs), and have applied to have those rights reinstated under a forest licence.

The submission from the Fort Nelson First Nation notes there is very little reference to them and Treaty 8 in the *Analysis Report*, nor is there any evaluation of the current AAC's impact on the level of infringement on Treaty 8 rights. The First Nation reminds the ministry of forests that they do not have the capacity to review current forestry activities, let alone increased harvesting.

Harvest Levels

Several submissions comment on the level at which the AAC should be set. The IWA expresses support for the forecasted increase in harvests and the opportunity to increase forest industry employment. The Economic Task Force says no radical changes should occur without consideration for socio-economic impacts and MELP says the current AACs appear to be well within sustainable limits, in spite of uncertainties and inaccuracies in the old inventory.

The Regional District notes that the analysis shows an opportunity to increase the AAC (even if not to the base case level) which they support if it is based on good science and if the level of confidence in the projections is high. The Regional District supports an increased AAC as a means of economic diversification but believes a prudent approach is needed given the variety of unknown factors.

SFP says the deciduous cut level should be set conservatively but that a 10-15% increase would be well-justified due to underestimates of deciduous volumes in the analysis, the high quality of aspen stands in the Fort Nelson TSA, and the need to include after-fire aspen stands in the harvesting land base. The company says the coniferous harvest level should not be increased by more than 10%, due to overestimates of coniferous volumes in the analysis, the low accuracy of inventory information, the impact of meeting landscape unit objectives, and the impact of the spruce budworm.

The Fort Nelson First Nation provides a number of reasons why they believe the AAC should not be increased. These include uncertainties around inventory data, future growth and productivity, and management practices in mixedwood stands. The First Nation expresses concern about the increased infringement on Treaty 8 rights and the projected elimination of older forests.

Appendix 1

Submissions received by the Fort Nelson Forest District

Submissions received on the Data Package

First Nations
Fort Nelson First Nation

Government agencies
Ministry of Environment, Lands and Parks, Regional Habitat Section

Industry
Slocan Forest Products Ltd. (3 submissions)
Omineca Enterprises

Local government
Fort Nelson-Liard Regional District (3 submissions)

Submissions received on the Timber Supply Analysis Report

First Nations
Fort Nelson First Nation

Government agencies
Ministry of Environment, Lands and Parks, Regional Habitat Section

Industry
Slocan Forest Products Ltd.
IWA Canada, Local 1-424
Omineca Enterprises Ltd.

Local government
Northern Rockies Regional District & Town of Fort Nelson

Interest groups
Fort Nelson Regional Economic Task Force